

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC BANK, N.A., a national banking association,

Plaintiff,

v.

MIGUEL ANGEL JIMENEZ a/k/a MIGUEL  
JIMENEZ, an individual; HILDA D. JIMENEZ, an  
individual; THE CITY OF CHICAGO, a municipal  
corporation,

Defendants.

Case No. 13-cv-04327

Assigned Judge: Charles R. Norgle, Sr.

Magistrate Judge: Michael T. Mason

Property Address: 2259 North Lorel  
Avenue, Chicago, Illinois 60639

**PLAINTIFF'S RULE 55 MOTION FOR  
ENTRY OF JUDGMENT OF FORECLOSURE AND SALE**

Plaintiff, PNC BANK, N.A., a national banking association, ("PNC Bank" or "Plaintiff"), by Lauren H. Lukoff of Deutsch, Levy, & Engel, Chartered, its attorneys, states in support of this Motion for Entry of a Judgment of Foreclosure and Sale against Defendants, MIGUEL ANGEL JIMENEZ a/k/a MIGUEL JIMENEZ, an individual ("M. Jimenez"), HILDA D. JIMENEZ, an individual ("H. Jimenez"), and THE CITY OF CHICAGO, a municipal corporation ("City of Chicago") (M. Jimenez, H. Jimenez, and City of Chicago are, collectively, "Defendants") pursuant to Federal Rule of Civil Procedure 55, as follows:

1. Plaintiff filed its Complaint to Foreclose Mortgage and for Other Relief (the "Complaint") on June 11, 2013, seeking foreclosure of the Mortgage (as that term is defined in the Complaint).
2. On January 3, 2014, this Court entered a default order against Defendants for their failure to defend and deny the allegations set forth in Plaintiff's Complaint.

3. Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Affidavit of Amounts Due and Owing, attached hereto as Exhibit A, and expressly incorporated herein.

4. Plaintiff's attorneys' fees and court costs are more specifically set forth in its supporting Affidavit of Attorneys' Fees, attached hereto as Exhibit B, and expressly incorporated herein.

5. Plaintiff's proposed Judgment of Foreclosure and Sale is attached hereto as Exhibit C, and expressly incorporated herein.

6. Plaintiff is entitled to a Judgment of Foreclosure and Sale as a matter of law.

WHEREFORE, Plaintiff, PNC BANK, N.A., a national banking association, respectfully requests that this Honorable Court:

- (a) Enter a Judgment of Foreclosure and Sale,
- (b) For such other and further relief this Honorable Court deems just and proper.

Respectfully submitted,

PNC BANK, N.A., a national banking  
association

By: /s/ Lauren H. Lukoff  
One of its Attorneys

Mr. Kenneth S. Strauss (ARDC# 6278542) (kstrauss@dlec.com)  
Ms. Lauren H. Lukoff (ARDC# 6297069) (llukoff@dlec.com)  
DEUTSCH, LEVY & ENGEL, CHARTERED  
*Attorneys for Plaintiff*  
225 W. Washington Street, Suite 1700  
Chicago, Illinois 60606  
(312) 346-1460  
(312) 346-1859 (Fax)